

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ATLAS GLOBAL TECHNOLOGIES LLC,

Plaintiff,

v.

TP-LINK TECHNOLOGIES CO., LTD.,
TP-LINK CORPORATION LTD, and
TP LINK INTERNATIONAL LTD.,

Defendants.

Civil Action No. 2:21-cv-430-JRG

JURY TRIAL DEMANDED

**DECLARATION OF JIANMEI SUN IN SUPPORT OF DEFENDANTS' MOTIONS TO
DISMISS FOR LACK OF PERSONAL JURISDICTION, DEFENDANTS' MOTION TO
DISMISS FOR INSUFFICIENT SERVICE OR PROCESS, AND DEFENDANTS'
OPPOSED MOTION UNDER 28 U.S.C. 1404(a) TO TRANSFER THE ACTION TO THE
CENTRAL DISTRICT OF CALIFORNIA**

I, Jianmei Sun, declare as follows:

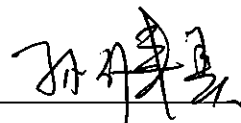
1. I am a Director of TP-Link Corporation Limited. I submit this declaration in support of Defendant's Motion to Dismiss for Lack of Personal Jurisdiction, Motion to Dismiss for Insufficient Service of Process, and Motion to Transfer Venue to the Central District of California in the above-referenced case. I have person knowledge of the matters stated in this Declaration.

2. TP-Link International Ltd. is a named Defendant in this case. However, in the year 2020, TP-Link International Ltd. changed its name to TP-Link Corporation Limited. Herein, I refer to TP-Link Corporation Limited as "TP-Link Hong Kong.")

3. TP-Link Hong Kong is a privately held corporation organized under the laws of Hong Kong, with its headquarters and principal place of business in Hong Kong. TP-Link Hong Kong does not have any employees or agents in Texas. Nor does it own, lease, or operate any offices or other facilities in Texas. TP-Link Hong Kong does not design, manufacture, sell, or offer to sell any products in Texas. TP-Link Hong Kong does not ship products to Texas, and it does not conduct any marketing or advertising in, or directed toward, Texas. TP-Link Hong Kong does not direct or control the activities of TP-Link USA Corporation ("TP-Link USA") in importing, marketing, advertising, offering to sell, or selling TP-Link branded products in the United States. Plaintiff has submitted a Declaration from Richard Xu dated June 24, 2013 that stated "TP-LINK USA is a subsidiary of TP-LINK Tech; however, TP-Link Tech does not control the day-to-day management of TP-Link USA. TP-LINK USA is its own independent business and makes its own corporate decisions." Dkt. 20-2 at ¶4. However, at all times relevant to this case, TP-Link USA was not, and is not, a subsidiary (either directly or indirectly) of TP-Link Hong Kong.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 16, 2022.

A handwritten signature in black ink, appearing to be '孙梅君' (Sun Mei Jun), written over a horizontal line.

Jianmei Sun